

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DAVID BURNETT, MICHAEL PARADISE, AND
DAVID NELSON as representatives of a class of
similarly situated persons, and on behalf of the
WESTERN GLOBAL AIRLINES, INC.
EMPLOYEE STOCK OWNERSHIP PLAN,

Plaintiffs,

v.

PRUDENT FIDUCIARY SERVICES LLC, MIGUEL
PAREDES, JAMES K. NEFF, CARMIT P. NEFF,
JAMES K. NEFF REVOCABLE TRUST DATED
11/15/12, CARMIT P. NEFF REVOCABLE TRUST
DATED 11/15/12, WGA TRUST DATED 8/16/13,
and JOHN DOES 1-10,

Defendants.

C.A. No. 1:22-cv-00270-RGA

**STIPULATION AND ORDER EXTENDING THE TIME
TO RESPOND TO THE COMPLAINT**

WHEREAS, Plaintiffs filed a Complaint in the above-captioned action on February 28, 2022;

WHEREAS, Defendants accepted service on March 8, 2022;

WHEREAS, Defendants' response date is currently March 29, 2022;

WHEREAS, since service of the Complaint, the Parties have been working together to minimize unnecessary costs of litigation;

WHEREAS, the Parties agree that judicial economy and the interests of the Parties in avoiding unnecessary expenses and in resolving the litigation would be best served and promoted by continuing Defendants' response deadline to April 29, 2022 in this action;

WHEREAS, if Defendants file a pre-Answer motion, pursuant to Local Rule 7.1.2(b), Plaintiffs' response would be due within 14 days;

WHEREAS, the Parties agree that judicial economy and the interests of the Parties in avoiding unnecessary expenses and in resolving the litigation would be best served and promoted by extending Plaintiffs' deadline to respond to any pre-Answer motion that Defendants may bring to 45 days from the date of service of any such pre-Answer motion;

WHEREAS, these are the first extensions requested in this matter;

WHEREAS, the Parties agree that these extensions are sought in good faith and neither Party will be prejudiced by extending the foregoing deadlines;

WHEREAS, the extension is not sought to unduly delay the litigation or for any other improper purpose; and

WHEREAS, nothing in this stipulation constitutes a waiver of any arguments or defenses that Defendants may assert in their responsive pleadings, all of which are expressly reserved;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, subject to the approval of the Court, that:

1. Defendants shall have up to and including April 29, 2022, to move, answer or otherwise respond to the Complaint; and
2. Should Defendants respond by filing a pre-Answer motion, Plaintiffs may have 45 days to file an answering brief, and Defendants may have 28 days to file a reply brief.

Dated: March 22, 2022

COOCH AND TAYLOR, P.A.

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IT IS SO ORDERED, this _____ day of March, 2022.

The Honorable Richard G. Andrews